**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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|---|---|
| In re: | : |
| | :   **Chapter 13** |
| Keisha M. Brown | : |
| | :   **Bankruptcy No: 20-12233-amc** |
| Debtor. | : |

## NOTICE OF MOTION TO MODIFY PLAN AFTER CONFIRMATION

Debtor, by her attorney, Erik B. Jensen, has filed a Motion to Modify Plan After Confirmation.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult an attorney.

1. If you do not want the Court to grant the Motion, or if you want the court to consider your views on the motion, then on or before July 16, 2021 you or your attorney must do all of the following:

        (a) file an answer explaining your position at
          Office of the Clerk
          United States Bankruptcy Court
          Suite 400
          900 Market Street
          Philadelphia PA 19107

If you mail your answer to the Bankruptcy Clerks Office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

        (b) mail a copy to Movant's Attorney:
          Erik B. Jensen, Esquire
          Jensen Bagnato, P.C.
          1500 Walnut Street, Suite 1510
          Philadelphia, PA 19102

          William C Miller, Trustee
          Chapter 13 Trustee
          P.O. Box 1229
          Philadelphia, PA 19105

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1 (b) above and attend the hearing, the court may enter an Order granting the Motion.

3. A hearing on the Motion is scheduled to be held before the Honorable Ashely M. Chan, United States Bankruptcy Judge August 3, 2021 at 10:00AM, Courtroom 4, United States Bankruptcy Court, 900 Market Street, 2nd Floor.

4. If a copy of the Motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800, to find out whether the hearing has been cancelled because no one filed an answer.